

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

THE ESTATE OF YARON UNGAR, et al.

vs.

C.A. No. 00 - 105L

THE PALESTINIAN AUTHORITY, et al.

**PLAINTIFFS' MOTION FOR LEAVE TO FILE A REPLY TO DEFENDANTS' NEW
ARGUMENTS IN SUPPORT OF THEIR RULE 12(b)(1) MOTION**

For the reasons presented in the accompanying Memorandum in support of this Motion, plaintiffs hereby move for leave to file the attached Reply to Defendants' New Arguments in Support of Their Rule 12(b)(1) Motion to Dismiss the Amended Complaint.

Plaintiffs, by their Attorneys,

David J. Strachman #4404
McIntyre, Tate, Lynch & Holt
321 South Main Street, Ste. 400
Providence, RI 02903
(401) 351-7700
(401) 331-6095 (fax)

CERTIFICATION

I hereby certify that on the 17th day of November, 2003 I mailed a true copy of the within to:

Ramsey Clark
Lawrence W. Schilling
36 East 12th Street
New York, NY 10003

250

Deming E. Sherman
Annemarie M. Carney
EDWARDS & ANGELL, LLP
2800 Bank Boston Plaza
Providence, RI 02903

Donna R. Collins

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DISTRICT OF RHODE ISLAND

THE ESTATE OF YARON UNGAR, et al.

vs.

C.A. No. 00 - 105L

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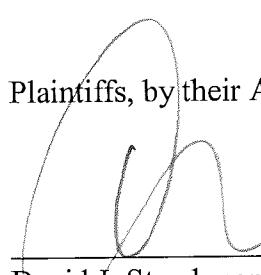
**MEMORANDUM IN SUPPORT OF PLAINTIFFS' MOTION FOR LEAVE
TO FILE A REPLY TO DEFENDANTS' NEW ARGUMENTS
IN SUPPORT OF THEIR RULE 12(b)(1) MOTION**

While plaintiffs are loathe to burden the Court with further pleadings, the PA and PLO have filed a "Response to Plaintiffs' Surreply in Further Support of Defendants' Rule 12(b)(1) Motion to Dismiss" containing two entirely new arguments that were not included in defendants' Motion to Dismiss or their Reply brief.

Plaintiffs should be given an opportunity to briefly address these two new arguments.

Therefore, the Court is respectfully requested to permit plaintiffs to file the attached Reply to Defendants' New Arguments in Support of Their Rule 12(b)(1) Motion to Dismiss the Amended Complaint

Plaintiffs, by their Attorneys,



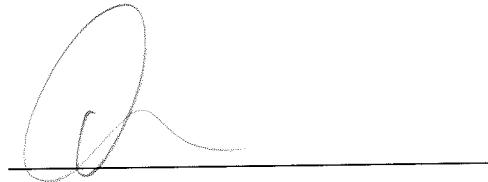
David J. Strachman #4404
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CERTIFICATION

I hereby certify that on the 14th day of November, 2003 I mailed a true copy of the within to:

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